



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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BRUCE RAUNER, GOVERNOR

ALEX MESSINA, DIRECTOR

217/785-1705

CONSTRUCTION PERMIT - REVISED
PSD APPROVAL
NESHAP SOURCE

PERMITTEE

Winpak Heat Seal Corporation
Attn: Bruce Hoerr
1821 Riverway Drive
Pekin, Illinois 61554

Application No.: 14040006 I.D. No.: 179473AAI
Applicant's Designation: Date Received: February 8, 2016
Subject: Modification to Presses 1, 2 and 3; Installation of Oxidizer
Date Issued: DRAFT 2/27/2018
Location: 1821 Riverway Drive, Pekin

This Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of a modification to Presses 1, 2 and 3 and installation of an oxidizer system for Presses 1, 2 and 3 and ancillary operations, as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

In conjunction with this revised construction permit, approval is given with respect to the federal regulations for Prevention of Significant Deterioration of Air Quality (PSD) for the above referenced project, as addressed by the application for a revised permit, in that the Illinois Environmental Protection Agency (Illinois EPA) finds that this application fulfills all applicable requirements of 40 CFR 52.21. This approval is issued pursuant to the federal Clean Air Act, as amended, 42 U.S.C. 7401 et seq., the Federal regulations promulgated thereunder at 40 CFR 52.21 for PSD, and a Delegation of Authority agreement between the United States Environmental Protection Agency (USEPA) and the Illinois EPA for the administration of the PSD Program. This approval becomes effective in accordance with the provisions of 40 CFR 124.15 and may be appealed in accordance with the provisions of 40 CFR 124.19. This approval is also based upon and subject to the findings and conditions which follow.

If you have any questions on this permit, please contact Jason Schnepf at 217/524-3724.

Raymond E. Pilapil
Manager, Permit Section
Division of Air Pollution Control

REP:JMS:

cc: Office of Community Relations
CES

Findings for the Revised Permit

1. a. Winpak Heat Seal Corporation (Winpak) operates a flexographic printing facility in Pekin, Illinois. The facility manufactures flexible packaging for the food, beverage and healthcare industries. The principal emission units at the facility are three flexographic printing presses, Presses 1, 2 and 3, with natural gas-fired curing ovens. Ancillary units include a plate making system, a soak tank*, a parts cleaner and a solvent recovery system. All of these emission units are located in an "enclosure" with emissions of volatile organic material (VOM) controlled by a natural gas-fired regenerative thermal oxidizer (oxidizer).

Note: When originally constructed, the facility included two wash tanks (see Construction Permit 06040051). The two wash tanks have since been removed from the facility. In March 2017, Winpak applied for and was granted a construction permit (Construction Permit 17030014) to install a new soak tank at the facility. Because the new soak tank is already appropriately addressed by Construction Permit 17030014, it is not further addressed by this permit.
- b. This construction permit was originally issued in April 2014, for an increase in production of Press 1 and 2, together with the installation of the oxidizer system that now controls VOM emissions from the presses and other units in the enclosure.
- c. Winpak applied for revisions to this permit to address requirements of the PSD rules, 40 CFR 52.21. These requirements became applicable for the VOM emissions of all emission units at the facility when Winpak operated the emission units originally installed at the facility, including Presses 1 and 2, as a major source for VOM emissions under the PSD rules. While requiring a decrease in the facility's actual VOM emissions, this permit provides for an increase in the overall production of the facility.
2. Winpak is located in Cincinnati Township in Tazewell County, an area designated attainment or unclassified for all criteria pollutants except sulfur dioxide (SO₂).
3. Because the facility is not a significant source of emissions for regulated NSR pollutants other than VOM, PSD was only triggered for VOM. (See Attachment 1.)
4. The Illinois EPA has determined that the facility will use Best Available Control Technology (BACT) for VOM as required by the PSD rules (See Condition 3-1), as well as be designed to be able to comply with applicable federal and state emission standards.
5. The facility ~~was not~~ subject to the applicable requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63 Subpart KK. ~~These requirements become applicable when the facility's emissions of an individual hazardous air pollutant (HAP) exceeded the major source~~

threshold for an individual HAP. For the presses and other subject equipment, Winpak currently complies with this NESHA by use of compliant materials. With the continued use of compliant materials, emissions of HAP are below the major source thresholds of an individual HAP and combined HAPs, and Subpart KK will no longer be an applicable requirement. This permit reflects that change in regulatory applicability.

6. The air quality analysis submitted by Winpak and reviewed by the Illinois EPA shows that the facility's VOM emissions do not cause a violation of the national ambient air quality standard (NAAQS) for ozone.
7. After reviewing all material submitted by Winpak in its application for a revised permit, the Illinois EPA has determined the relevant requirements of the PSD rules are satisfied.
8. A copy of the application, a summary of the Illinois EPA's review of the application and a draft of this revised permit were made available at a location in the vicinity of the plant. The public was given notice, an opportunity to examine these materials and to submit comments, and to request and participate in a public hearing on this matter.

Commented [SD1]: IEPA - To date, Winpak has been complying with NESHA Subpart KK.

However, in this permit issuance, we request to exercise the February 8, 2018 Federal Register notice (83 FR 5543) that withdrew the May 16, 1995 "once in, always in" policy. Using compliant low-HAP materials on the presses lowers the facility-wide HAP emissions to less than major source thresholds. As such, the facility should not be classified as a major source of HAPs. We've removed the Subpart KK requirements, addressed its nonapplicability in the "Nonapplicability Provisions" section, and added limits/recordkeeping associated with the major source HAP limits.

Unit-Specific Conditions

1. Introduction

- a. This permit authorizes installation of a control system, with a regenerative thermal oxidizer (RTO) or oxidizer. This system would control VOM emissions from Presses 1, 2 and 3 and ancillary equipment.
- b.
 - i. This revised permit also addresses the BACT requirement of the PSD rules for the VOM emissions of Presses 1, 2 and 3 and associated ancillary equipment including a plate making system, the parts cleaner and the solvent recovery system. This revised permit also address BACT for VOM emissions of heating units at the plant.
 - ii. This revised permit also addresses an increase in production for all three presses.
- c. In this permit:
 - i. Presses 1, 2 and 3 are referred to as the "affected presses."
 - ii. The affected presses and the plate making system, the parts cleaner and the solvent recovery system are all referred to as the "affected process units."
 - iii. The heating units are referred to as the "affected heating units."
 - iv. The affected process units and the affected heating units are referred to as the "affected units."

2. List of Emission Units and Emission Control Equipment

Emission Unit	Description	Emission Control Equipment
Press 1, 2 and 3	Three flexographic presses, with natural gas-fired curing ovens	Permanent Total Enclosure and Natural Gas-fired Oxidizer
Plate Making System	Equipment for making printing plates for the presses	
Parts Cleaner	Equipment for solvent cleaning parts, totes and other equipment associated with Press 3	
Solvent Recovery System	Equipment for recycling spent solvent from cleaning operations	
Heating Units	Heating equipment such as building air make-up units and comfort heaters	None

3-1. Best Available Control Technology (BACT)

- a. For affected process units:

- i. The capture systems shall be operated to meet the criteria for Permanent Total Enclosure, USEPA Method 204.
- ii. The captured emissions shall be ducted to an oxidizer that is operated to achieve a VOM destruction efficiency of at least 98 percent, on a 3-hour average.
- b. The Permittee shall implement the following work practices to reduce VOM emissions from affected units:
 - i. General:
 - A. Transport VOM containing material in closed containers;
 - B. Store inks, solvents and other VOM containing material in sealed containers;
 - C. Use plunger cans, squeeze bottles or similar apparatus to apply VOM containing solvent to clean-up rags; and
 - D. Store used rags from any manual cleaning operations that use VOM containing material in spring-loaded, closed containers.
 - ii. For the affected presses:

Use an automated parts cleaner equipped with a permanent lid for cleaning parts of the press when they are removed during maintenance ~~or cleanup~~.
 - iii. For the parts cleaner:
 - A. Maintain a permanent lid or cover on the unit and keep the cover closed when parts are not being handled;
 - B. Drain parts until dripping ceases before removal from a unit;
 - C. Maintain a minimum freeboard height of 7/10 of the inside width of the tank or 91 cm (36 in), whichever is less; and
 - D. Operate the unit without heating the solvent above ambient room temperature.
 - iv. For the solvent recovery system:
 - A. Operate the solvent recovery system as a closed loop system with venting only occurring when checking solvent level in the spent solvent recovery drum; and

Commented [SD2]: IEPA - We added this language for additional flexibility.

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- [illegible]

- [illegible]

- 40 CFR 63.622(b)(1) which provides that each owner or operator of a source subject to the requirements of 40 CFR 63.103(a)(1) shall determine whether the source is a major source of hazardous air pollutants under 40 CFR 63.103(a)(1) as follows:

1. 2. 3. 4. 5. 6. 7. 8. 9. 10. 11. 12. 13. 14. 15. 16. 17. 18. 19. 20. 21. 22. 23. 24. 25. 26. 27. 28. 29. 30. 31. 32. 33. 34. 35. 36. 37. 38. 39. 40. 41. 42. 43. 44. 45. 46. 47. 48. 49. 50. 51. 52. 53. 54. 55. 56. 57. 58. 59. 60. 61. 62. 63. 64. 65. 66. 67. 68. 69. 70. 71. 72. 73. 74. 75. 76. 77. 78. 79. 80. 81. 82. 83. 84. 85. 86. 87. 88. 89. 90. 91. 92. 93. 94. 95. 96. 97. 98. 99. 100. 101. 102. 103. 104. 105. 106. 107. 108. 109. 110. 111. 112. 113. 114. 115. 116. 117. 118. 119. 120. 121. 122. 123. 124. 125. 126. 127. 128. 129. 130. 131. 132. 133. 134. 135. 136. 137. 138. 139. 140. 141. 142. 143. 144. 145. 146. 147. 148. 149. 150. 151. 152. 153. 154. 155. 156. 157. 158. 159. 160. 161. 162. 163. 164. 165. 166. 167. 168. 169. 170. 171. 172. 173. 174. 175. 176. 177. 178. 179. 180. 181. 182. 183. 184. 185. 186. 187. 188. 189. 190. 191. 192. 193. 194. 195. 196. 197. 198. 199. 200. 201. 202. 203. 204. 205. 206. 207. 208. 209. 210. 211. 212. 213. 214. 215. 216. 217. 218. 219. 220. 221. 222. 223. 224. 225. 226. 227. 228. 229. 230. 231. 232. 233. 234. 235. 236. 237. 238. 239. 240. 241. 242. 243. 244. 245. 246. 247. 248. 249. 250. 251. 252. 253. 254. 255. 256. 257. 258. 259. 260. 261. 262. 263. 264. 265. 266. 267. 268. 269. 270. 271. 272. 273. 274. 275. 276. 277. 278. 279. 280. 281. 282. 283. 284. 285. 286. 287. 288. 289. 290. 291. 292. 293. 294. 295. 296. 297. 298. 299. 300. 301. 302. 303. 304. 305. 306. 307. 308. 309. 310. 311. 312. 313. 314. 315. 316. 317. 318. 319. 320. 321. 322. 323. 324. 325. 326. 327. 328. 329. 330. 331. 332. 333. 334. 335. 336. 337. 338. 339. 340. 341. 342. 343. 344. 345. 346. 347. 348. 349. 350. 351. 352. 353. 354. 355. 356. 357. 358. 359. 360. 361. 362. 363. 364. 365. 366. 367. 368. 369. 370. 371. 372. 373. 374. 375. 376. 377. 378. 379. 380. 381. 382. 383. 384. 385. 386. 387. 388. 389. 390. 391. 392. 393. 394. 395. 396. 397. 398. 399. 400. 401. 402. 403. 404. 405. 406. 407. 408. 409. 410. 411. 412. 413. 414. 415. 416. 417. 418. 419. 420. 421. 422. 423. 424. 425. 426. 427. 428. 429. 430. 431. 432. 433. 434. 435. 436. 437. 438. 439. 440. 441. 442. 443. 444. 445. 446. 447. 448. 449. 450. 451. 452. 453. 454. 455. 456. 457. 458. 459. 460. 461. 462. 463. 464. 465. 466. 467. 468. 469. 470. 471. 472. 473. 474. 475. 476. 477. 478. 479. 480. 481. 482. 483. 484. 485. 486. 487. 488. 489. 490. 491. 492. 493. 494. 495. 496. 497. 498. 499. 500. 501. 502. 503. 504. 505. 506. 507. 508. 509. 510. 511. 512. 513. 514. 515. 516. 517. 518. 519. 520. 521. 522. 523. 524. 525. 526. 527. 528. 529. 530. 531. 532. 533. 534. 535. 536. 537. 538. 539. 540. 541. 542. 543. 544. 545. 546. 547. 548. 549. 550. 551. 552. 553. 554. 555. 556. 557. 558. 559. 560. 561. 562. 563. 564. 565. 566. 567. 568. 569. 570. 571. 572. 573. 574. 575. 576. 577. 578. 579. 580. 581. 582. 583. 584. 585. 586. 587. 588. 589. 590. 591. 592. 593. 594. 595. 596. 597. 598. 599. 600. 601. 602. 603. 604. 605. 606. 607. 608. 609. 610. 611. 612. 613. 614. 615. 616. 617. 618. 619. 620. 621. 622. 623. 624. 625. 626. 627. 628. 629. 630. 631. 632. 633. 634. 635. 636. 637. 638. 639. 640. 641. 642. 643. 644. 645. 646. 647. 648. 649. 650. 651. 652. 653. 654. 655. 656. 657. 658. 659. 660. 661. 662. 663. 664. 665. 666. 667. 668. 669. 670. 671. 672. 673. 674. 675. 676. 677. 678. 679. 680. 681. 682. 683. 684. 685. 686. 687. 688. 689. 690. 691. 692. 693. 694. 695. 696. 697. 698. 699. 700. 701. 702. 703. 704. 705. 706. 707. 708. 709. 710. 711. 712. 713. 714. 715. 716. 717. 718. 719. 720. 721. 722. 723. 724. 725. 726. 727. 728. 729. 730. 731. 732. 733. 734. 735. 736. 737. 738. 739. 740. 741. 742. 743. 744. 745. 746. 747. 748. 749. 750. 751. 752. 753. 754. 755. 756. 757. 758. 759. 760. 761. 762. 763. 764. 765. 766. 767. 768. 769. 770. 771. 772. 773. 774. 775. 776. 777. 778. 779. 780. 781. 782. 783. 784. 785. 786. 787. 788. 789. 790. 791. 792. 793. 794. 795. 796. 797. 798. 799. 800. 801. 802. 803. 804. 805. 806. 807. 808. 809. 810. 811. 812. 813. 814. 815. 816. 817. 818. 819. 820. 821. 822. 823. 824. 825. 826. 827. 828. 829. 830. 831. 832. 833. 834. 835. 836. 837. 838. 839. 840.

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40 CFR 63.634(b), which provides that no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit except as provided for in 35 IAC 212.123(b).

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3-2. Applicable State Emission Standards

- a. The affected process units and the affected heating units are subject to 35 IAC 212.123(a), which provides that no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit except as provided for in 35 IAC 212.123(b).
- b. The affected process units are subject to 35 IAC 212.321, which provides that no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c).
- c. The affected process units are subject to 35 IAC 214.301, which provides that no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm.
- d. The affected process units are subject to 35 IAC 215.301, which provides that no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission source, except as provided in 35 IAC 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists this limitation shall apply only to photochemically reactive material.
- e. The affected presses are subject to the following requirements in 35 IAC Part 215 Subpart P: Printing and Publishing. This is because the aggregate uncontrolled VOM emissions are no longer limited to no more than 1,000 tons per year so that the exemption from these requirements in 35 IAC 215.402 is no longer applicable.
 - i. 35 IAC 215.401(c)(2), which provides that no owner or operator of a flexographic printing press subject to this rule and employing solvent-containing ink may cause or allow the operation of such press unless the owner or operator installs and operates an afterburning system which

oxidizes at least 90 percent of the captured nonmethane volatile organic materials (measured as total combustible carbon) to carbon dioxide and water.

- ii. 35 IAC 215.401(d)(3), which provides that no owner or operator of a flexographic printing press subject to this rule and employing solvent-containing ink may cause or allow the operation of such press unless a capture system is used in conjunction with any of the emission control systems in 35 IAC 215.401(c). The design and operation of the capture system must be consistent with good engineering practice and shall provide, in combination with the control equipment, an overall reduction in volatile organic material emissions of at least 60 percent where a flexographic printing process is employed.

- f. The parts cleaner is subject to 35 IAC 215 Subpart E: Solvent Cleaning. The requirements for Cold Cleaning, 35 IAC 215.182 apply to this unit.

4. Nonapplicability Provisions

- a. The affected heating units are not subject to 35 IAC 216.121. This is because the actual heat input capacity of each unit is 10 mmBtu/hr or less.

- b. ~~The affected presses are not subject to NESHAP for the Printing and Publishing Industry, 40 CFR 63 Subpart KK. This is because the facility is not classified as a major source of HAPs.~~

- ~~c. The affected heating units are not subject to NESHAP for Major Source for Industrial, Commercial and Institutional Boilers, 40 CFR 63 Subpart DDDDD. This is because the affected heating units are neither process heaters nor boilers as those terms are defined in 40 CFR 63.1575. This is because the facility is not classified as a major source of HAPs.~~

- ~~d. The affected heating units are not subject to NESHAP for Area Source for Industrial, Commercial and Institutional Boilers, 40 CFR 63 Subpart JJJJJJ. This is because the affected heating units are not boilers as that term is defined in 40 CFR 63.11351.~~

- ~~e. The affected heating units are not subject to the New Source Performance Standards (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60 Subpart Dc. This is because the maximum heat input capacity of each affected heating unit is less than or equal to 10 mmBtu/hr.~~

5. Control Requirements

- a. For the capture system, the Permittee shall:
 - i. ~~Maintain the facial velocity of air flow through all natural draft openings to at least 200 feet per minute.~~

Commented [SD3]: We inserted additional nonapplicability provisions per the HAP area source status.

~~3-hour~~ average, or the pressure drop to at least 0.007 inches of water, ~~3-hour~~ average; and

Commented [SD4]: IEPA - We updated the averaging period of pressure drop/airflow to an 3-hour average. This is consistent with the averaging period for the oxidizer at Condition 3-1.a.ii. We intend to comply with that portion of the requirement.

ii. Maintain the direction of air flow into the enclosure at all times.

b. The combustion chamber of the oxidizer shall be preheated to the temperature at which compliance was demonstrated in the most recent compliance test, or 1600°F (3-hour average), before an affected unit begins operation, and this temperature shall be maintained during operation of the affected unit.

c. Bypass lines enabling captured air flow from the affected process units to be diverted away from the control device are prohibited.

6. Operational and Emission Limits

a. i. VOM usage and VOM emissions of the affected presses shall not exceed the following limits.

| VOM Usage | | VOM Emissions | |
|------------|-----------|---------------|-----------|
| Tons/Month | Tons/Year | Tons/Month | Tons/Year |
| 300 | 3,000 | 6.0 | 60.0 |

ii. VOM emissions of the plate making system, parts cleaner and solvent recovery system, in total shall not exceed 0.5 tons/year.

iii. VOM emissions of the affected heating units shall not exceed 1.0 tons per year.

iv. Compliance with these annual limits shall be determined from a running total of 12 consecutive months of data.

b. The rated heat input capacity of the burners in the curing ovens and oxidizer shall not exceed the following limits:

| Equipment | Rated Heat Input Capacity
(mmBtu/hr) |
|---------------------------------------|---|
| Press 1 and 2 Curing Ovens (combined) | 4.1 |
| Press 3 Curing Oven | 1.5 |
| Oxidizer | 10.8 |

c. All access doors and windows in the capture system that are not natural draft openings shall be kept closed during routine operation of the capture system.

d. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from this source shall not exceed 10.0 tons/year of any single HAP and 25 tons/year of any combination of such HAPs.

7. Emission Testing Requirements

Note: The testing required by Condition 7 has been completed and this revised permit does not require it to be repeated. Periodic testing is addressed by the Clean Air Act Permit Program (CAAPP) permit for the source, Permit No. 07100015 issued May 15, 2015, Condition 4.1.2(f)(ii)(D), which requires retesting of the affected presses and oxidizer by May 15, 2020.

a. Timing and Scope of Required Test

- i. The Permittee shall have an emissions test performed on the affected presses operating with the oxidizer no later than July 31, 2015.
- ii. This test shall be performed during operating conditions that are representative of maximum emissions. This test shall be designed to determine the destruction efficiency of the oxidizer.
- iii. If the criteria for total enclosure are not met, this test shall also be designed to determine the capture efficiency of the capture system for the affected presses.

b. Test Methods and Procedures

The following USEPA methods and procedures shall be used for testing as further specified in 35 IAC 218.105(d) and (f), unless use of another method developed or supported by USEPA is approved by the Illinois EPA as part of approval of the test plan.

| | |
|---------------------------|--|
| Location of Sample Points | USEPA Method 1 |
| Gas Flow and Velocity | USEPA Method 2 |
| Flue Gas Weight | USEPA Method 3 |
| Moisture | USEPA Method 4 |
| Volatile Organic Material | USEPA Method 25, 25A if outlet VOM
cont. < 50 ppmv as C Non CH ₄ |
| Capture Efficiency | USEPA Method 204 |

c. Reporting and Notifications Associated with Emissions Tests

- i. At least 60 days prior to the actual date of required emissions testing, a written test plan shall be submitted to the Illinois EPA for review. This plan shall describe the specific procedures for testing, including as a minimum:
 - A. The person(s) who will be performing sampling and analysis and their experience with similar tests.
 - B. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating

parameters for the emission unit and any control equipment will be determined.

- C. The specific determinations of emissions and operation, which are intended to be made, including sampling and monitoring locations.
 - D. The test method(s) that will be used, with the specific analysis method, if the method can be used with different analysis methods.
 - E. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification.
- ii. The Illinois EPA shall be notified prior to emissions tests required by this permit to enable the Illinois EPA to observe these tests. Notification of the expected date of testing shall be submitted a minimum of 30 days prior to the expected date. Notification of the actual date and expected time of testing shall be submitted a minimum of 5 working days prior to the actual date of the test. The Illinois EPA may at its discretion accept notifications with shorter advance notice provided that the Illinois EPA will not accept such notifications if it interferes with the Illinois EPA's ability to observe testing.
 - iii. Copies of the Final Reports(s) for required emissions tests shall be submitted to the Illinois EPA within 60 days after the date of testing. The Final Report shall include as a minimum:
 - A. A summary of results.
 - B. General information.
 - C. Description of test method(s), including description of sample points sampling train, analysis equipment, and test schedule.
 - D. Detailed description of test conditions, including process information and control equipment information, e.g., equipment condition and operating parameters during testing.
 - E. Data and calculations, including copies of all raw data sheets, records of laboratory analyses, sample calculations, and data on equipment calibration.

8. Monitoring Requirements

- a. i. The Permittee shall use continuous monitoring equipment that is installed, calibrated and maintained according to manufacturer's specifications and operated at all times

that any of the affected presses are in operation to monitor the following:

- A. For the oxidizer, the temperature in the combustion chamber of the oxidizer. This device shall have an accuracy of ± 1 percent of the temperature measured in degrees Celsius. During a malfunction of the continuous monitoring equipment, the Permittee shall record the temperature of the combustion chamber of the oxidizer at least hourly.
- B. For the capture system (press room), the pressure drop between the interior and exterior of the enclosure. This instrumentation, ~~to be installed within 60 days of permit issuance,~~ shall be designed to provide measurements of pressure drop to at least the nearest 0.001 inches of water.
 - ii. These monitoring devices shall make measurements no less frequently than every minute.
- b. The Permittee shall install, calibrate, operate and maintain in accordance with manufacturer's specifications a continuous electronic recorder to record the data collected by these monitoring devices on an hourly block average, based on the short-term data measured during each hour.
- c. The Permittee shall keep a log or other records for the operation and maintenance of these monitoring systems that includes information detailing all routine and non-routine maintenance performed and dates and duration of any outages.

9. Recordkeeping Requirements

- a. For the affected presses, the Permittee shall maintain a maintenance log for the capture system control device and monitoring equipment detailing all maintenance and repairs performed including dates and duration of any outages.
- b. ~~In addition to the recordkeeping required at facilities, the~~
The Permittee shall keep the following operational records for the affected presses:
 - i. The name and identification number of each VOM containing material used.
 - ii. The VOM content (weight %) of each VOM containing material used, with supporting documentation.
 - iii. Material usage for each VOM containing material (tons/month and tons/year).

- iv. If credit is taken for VOM in coating material shipped off-site as waste, the quantity of VOM in the waste (tons/month and tons/year), with supporting documentation.
 - v. Usage of VOM (tons/month and tons/year), determined as the product of the usage of each material and its VOM content minus VOM shipped offsite as waste, if credit is taken for VOM in coating material shipped off-site as waste, with supporting calculations.
- c. The Permittee shall maintain a file or other records that contain the following information for the press curing ovens, affected heating units and oxidizer:
- i. Documentation for the rated heat input capacity of the curing ovens in the affected presses and calculations for the maximum annual emissions of NO_x, CO, PM, PM₁₀/PM_{2.5} and SO₂, attributable to combustion of fuel in these ovens, with supporting documentation and calculations.
 - ii. Documentation for the rated heat input capacity of the oxidizer and calculations for the maximum annual emissions of NO_x, CO, PM, PM₁₀/PM_{2.5} and SO₂, attributable to combustion of fuel and VOM in the oxidizer, with supporting documentation and calculations.
 - iii. Documentation for the rated heat input capacity of the affected heating units, and calculations for the maximum annual emissions of NO_x, CO, PM, PM₁₀/PM_{2.5} and SO₂ from these units, with supporting documentation and calculations.
- d. The Permittee shall maintain records of the overall VOM emissions of the following groups of units (tons/month and tons/year) with supporting documentation and calculations:
- i. The affected presses.
 - ii. The platemaking system, parts cleaner and solvent recovery system.
 - iii. The affected heating units.
- e. To demonstrate that the source is an area source of Hazardous Air Pollutants (HAPs), the Permittee shall maintain a file or other record that contains the individual and combined HAP emissions from the source with supporting documentation and calculations.

10. Reporting Requirements

The Permittee shall notify the Illinois EPA of deviations from the requirements of this permit within 30 days of such occurrence. Reports shall describe the deviation, the probable cause of such deviation, the corrective actions taken, and any preventive measures taken.

11. Addresses for Reports and Notifications

All reports and notifications required by this permit shall be submitted to the Illinois EPA at the following address and reference the ID No. for the source:

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

12. Authorization to Operate

The modified presses 1, 2 and 3 may be operated under this permit until renewal of the CAAPP permit for the source provided that the Permittee submits an application to revise its CAAPP permit to address the modified presses within 180 days of the date issued on this revised permit. This condition supersedes Standard Condition 6.

If you have any questions on this permit, please contact Jason Schnepf at 217/785-1705.

Raymond E. Pilapil
Manager, Permit Section
Division of Air Pollution Control

REP:JMS

cc: CES
Office of Community Relations

Attachment 1: Summary of the Emissions (Tons/Year)^a

| Unit | VOM | NO _x | CO | PM | PM ₁₀ /PM _{2.5} | SO ₂ |
|---|------|-----------------|-----|-----|-------------------------------------|-----------------|
| Presses 1, 2 and 3 ^b | 60.0 | 7.1 | 5.9 | 0.5 | 0.5 | <0.1 |
| Plate Making System, Parts Cleaner, Solvent Recovery System | 0.5 | --- | --- | --- | --- | --- |
| Heating Units | 1.0 | 2.8 | 2.3 | 0.2 | 0.2 | <0.1 |
| Totals: | 61.5 | 9.9 | 8.2 | 0.7 | 0.7 | 0.1 |

Table Note:

- a. This table provides the permitted VOM emissions of the affected process units and the potential emissions of the affected heating units. This summary does not include the soak tank addressed by Construction Permit 17030014, which has permitted VOM emissions of 2.1 tons/year.
- b. The limits for Presses 1, 2 and 3 also include emissions from the curing ovens for these presses.



STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
P. O. BOX 19506
SPRINGFIELD, ILLINOIS 62794-9506

**STANDARD CONDITIONS FOR CONSTRUCTION/DEVELOPMENT PERMITS
ISSUED BY THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY**

July 1, 1985

The Illinois Environmental Protection Act (Illinois Revised Statutes, Chapter 111-1/2, Section 1039) authorizes the Environmental Protection Agency to impose conditions on permits which it issues.

The following conditions are applicable unless superseded by special condition(s).

1. Unless this permit has been extended or it has been voided by a newly issued permit, this permit will expire one year from the date of issuance, unless a continuous program of construction or development on this project has started by such time.
2. The construction or development covered by this permit shall be done in compliance with applicable provisions of the Illinois Environmental Protection Act, and Regulations adopted by the Illinois Pollution Control Board.
3. There shall be no deviations from the approved plans and specifications unless a written request for modification, along with plans and specifications as required, shall have been submitted to the Agency and a supplemental written permit issued.
4. The Permittee shall allow any duly authorized agent of the Agency upon the presentation of credentials, at reasonable times:
 - a. to enter the Permittee's property where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit,
 - b. to have access to and copy any records required to be kept under the terms and conditions of this permit,
 - c. to inspect, including during any hours of operation of equipment constructed or operated under this permit, such equipment and any equipment required to be kept, used, operated, calibrated and maintained under this permit,
 - d. to obtain and remove samples of any discharge or emission of pollutants, and
 - e. to enter and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring, or recording any activity, discharge, or emission authorized by this permit.
5. The issuance of this permit:
 - a. shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are to be located,
 - b. does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the proposed facilities,
 - c. does not release the Permittee from compliance with the other applicable statutes and regulations of the United States, of the State of Illinois, or with applicable local laws, ordinances and regulations,
 - d. does not take into consideration or attest to the structural stability of any units or parts of the project, and

- e. in no manner implies or suggests that the Agency (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the proposed equipment or facility.
- 6.
 - a. Unless a joint construction/operation permit has been issued, a permit for operation shall be obtained from the Agency before the equipment covered by this permit is placed into operation.
 - b. For purposes of shakedown and testing, unless otherwise specified by a special permit condition, the equipment covered under this permit may be operated for a period not to exceed thirty (30) days.
- 7. The Agency may file a complaint with the Board for modification, suspension or revocation of a permit:
 - a. upon discovery that the permit application contained misrepresentations, misinformation or false statements or that all relevant facts were not disclosed, or
 - b. upon finding that any standard or special conditions have been violated, or
 - c. upon any violations of the Environmental Protection Act or any regulation effective thereunder as a result of the construction or development authorized by this permit.